

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE (MANCHESTER)

In re:
Alan Colpas
Debtor

Chapter 13
Case No.: 17-10958-BAH

OBJECTION TO PLAN

Now comes U.S. Bank National Association (together with its predecessors, successors, affiliates, principals, and assigns, "Creditor") a creditor and party in interest herein, and, by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan filed by Alan Colpas ("Debtor"). As grounds, Creditor states as follows:

1. Creditor is a secured creditor of Debtor and is secured by a first mortgage on Debtor's property located at 164 Whitehall Road, Hooksett, NH 03106 (the "Property").
2. As of July 1, 2017 the total pre-petition arrearage due and owing to Creditor is \$103,137.27, subject to revision upon filing of Creditor's proof of claim.
3. On or about July 20, 2017, Debtor filed a Chapter 13 Plan (the "Plan").
4. The Plan provides for the payment of the pre-petition arrearage in the amount of \$91,413.00.
5. The Plan does not provide for adequate treatment of Creditor's secured claim and is not feasible.

WHEREFORE, Creditor respectfully requests that this Honorable Court deny confirmation of Debtors' proposed Chapter 13 Plan.

U.S. Bank National Association
By its Attorneys,

Dated: August 23, 2017

/s/ Joseph Dolben, Esq.
Joseph Dolben, Esq., #673113
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CERTIFICATE OF SERVICE

I, Joseph Dolben, Esq., of Marinosci Law Group, P.C., do hereby certify that on August 23, 2017, I served a copy of the Objection to Confirmation of Plan on the attached service list by mailing a copy of same by first class mail, postage prepaid or other method specified on service list.

Signed this 23rd day of August, 2017.

/s/ Joseph Dolben, Esq.
Joseph Dolben, Esq., #07379
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VIA ECF

Sandra A. Kuhn Esq., on behalf of Debtor
Lawrence P. Sumski, Esq., on behalf of Trustee
Office of the U.S. Trustee, on behalf of U.S. Trustee

VIA US MAIL

Alan Colpas
164 Whitehall Road
Hooksett, NH 03106